

**DRAFT, 6/30/98**

**SOURCE WORK GROUP NAME:** Incinerator Work Group

**SOURCES/SUBCATEGORIES TO BE TESTED:** Drum Reclaimer Furnaces

Three sources/furnaces will be tested:

1. A furnace that is similar to the model plant
2. A furnace running less than 200 drums per hour and is a small business
3. An average to large size furnace that is less than 10 years of age

**PURPOSE & NEED FOR TESTING:** The Subteam searched the EPA ICCR Emissions Database, trade group records, EPA technical documents, State agency resources, and State air permits that specify emission limits and could not find data to accurately characterize these units. As a result, Subteam 4 has concluded that there is insufficient emissions data available to accurately characterize these units.

**SUMMARY OF CURRENTLY AVAILABLE TEST DATA:** The ICR Survey did not identify any HAPs emission data for drum reclamation furnaces. The trade group has found a single reference for some Section 129 pollutants. No data exist to characterize small drum furnaces.

**DATA GAPS TESTING WOULD FILL:** Subteam 4 has identified the following key emissions data gaps:

1. Insufficient data to characterize most Section 129 pollutants
2. The effect of furnace differences on emissions, including:
  - Size of the unit
  - Age of the unit
3. The effectiveness of possible MACT control devices

**ALTERNATIVES TO TESTING:** Since insufficient data exists to determine either a numerical emission limit or a percent reduction, the alternative to testing would be to estimate a MACT standard.

**DESCRIPTION OF COMBUSTION UNITS AND MATERIALS TO BE TESTED:** Typically these units are semi-continuous, natural gas fired tunnel furnaces equipped with an afterburner. Process rates range from 40 to 500 55-gal drums per hour. Container residues may include hazardous materials. The units would operate at or near the maximum rated/permitted capacity and would utilize a thermal oxidizer. Operating conditions would be representative of normal operating conditions.

**Priority 1** -- A natural gas fired drum furnace with a thermal oxidizer running approximately 300 drums per hour (Over 10 years of age)

**Priority 2** -- A natural gas fired furnace with a thermal oxidizer running less than 200 drums per hour (Any age, small business)

**Priority 3** -- A natural gas fired furnace with a thermal oxidizer running 300 or more drums per hour (Less than 10 years of age)

**NUMBER OF COMBUSTION UNITS AND TESTS:** The Subteam proposes to test three drum reclamation furnaces for all Section 129 pollutants.

**POLLUTANTS TO BE TESTED:** All Section 129 pollutants.

**LEVERAGING OF RESOURCES:** The Association of Container Reconditioners would act as a liaison between the Work Group and the test facilities.

**COST:** The Subteam estimates that the three emissions tests proposed, data analysis and data reporting will cost \$300,000 (This is a preliminary estimate)